

**Comment Letters
the U.S. Department of Energy
National Nuclear Security Administration
Nevada Operations Office Received
on the Preapproval Draft
Environmental Assessment
*Atlas Relocation and
Operation at the
Nevada Test Site*
DOE/EA-1381 DRAFT
February 2001**

Monday, 26 March 2001

Kenneth A. Hoar, Director
 Environment, Safety & Health Division
 Nevada Operations Office
 U.S. Department of Energy
 P.O. Box 98518
 Las Vegas, NV 89193-8518

ACTION	_____
INFO	ESHD
MGR	✓
AMBFS	_____
AMTS	✓
AMNS	_____
AMEM	_____
AMPIA	_____

LC / WMA

Dear Mr. Hoar:

Below are my formal comments concerning the "Atlas Relocation and Operation at the Nevada Test Site - Preapproval Draft Environmental Assessment" (DOE/EA-1381 DRAFT) dated February 2001, which was published by the U.S. Department of Energy, National Security Administration, Nevada Operations Office, Las Vegas, Nevada.

Thank you for providing me with an opportunity to comment on this important NEPA EA. The final approved EA should contain an updated version of the NTS map which appeared on page 5. Major administrative boundary alterations likely occurred on 5 October 1999, when President Clinton signed Public Law No: 106-65 into existence. That act involved the administrative transfer of approximately 127,620 acres of Pahute Mesa to the DOE and terminated DOE's administrative control over approximately 38,400 acres of lands in the Groom Lake region. That boundary alteration added approximately 89,220 acres to the withdrawn lands designated as the NTS. Such a late map error is difficult to understand given the fact that the Nevada Operation Office publicly announced the Pahute boundary change in a 15 December 1999 press release. This PR was moot on the Groom Lake changes and was never posted on the DOE/NV public web site. Since then DOE/NV has published the updated NTS map in several publications including the "Nevada Test Site Resource Management Plan" (DOE/NV-604) issued in January of 2000, and the "Report to Congress: Long-Term Stewardship" which was delivered to Congress in late January 2001, three and one-half months after its due date. The preparers of this draft EA were clearly aware of the NTS Resource Management Plan document since it was cited and appears in the References section under "DOE 2000a." If the final EA contains the map that now appears on page 5, then the DOE/NV should explain the reasoning behind using the old map and it should candidly explain why the Groom Lake region is not included on that NTS map.

I shall now address the draft EA text, citing the page number and line number first.

2-6 "The Atlas facility, classified as a low hazard, non-nuclear facility, provides significantly enhanced capability to the stockpile stewardship program..."

This is the position that also appears throughout DOE's "Final Programmatic Environmental Impact Statement for Stockpile Stewardship and Management (DOE/EIS-0236), September 1996 (1996 SSM PEIS), which justified the Atlas construction along with a host of other, similar projects. The significance and unique need for the Atlas and similar hydrodynamic facilities has recently been shown to be way overstated. Two financial audits were recently issued by DOE's Office of the Inspector General, "The Need for the Atlas Pulsed Power Experimental Facility" (Report No.: DOE/IG-0495), February 2001, and "Utilization of the Big Explosives Experimental Facility" (BEEF) (Report No.: WR-B-01-03), March 2001, which indicates the operation of the two facilities was not nearly as important as was their construction. In the case of the Atlas facility the DOE failed to give priority to funding its operation so it has achieved little except to prove the basic machine design works. Apparently, project management requirements were violated such as Department Order 430.1A, "Life Cycle Asset Management," and Department Guide GPG-FM-002, "Critical Decision Criteria." As a result the new machine may be put into a cold-standby status. Though operational funds are missing the funds to further tinker with the machine are not. Twelve million dollars has been made available to relocate this massive new machine that has yet to prove its worth. As a result some move proponents claim that operational funding will not be needed until FY 2003.

In the Atlas IG report is the statement that "[E]xception was also taken to the statement that not operating Atlas might impact the confidence level of the stockpile. Management stated this would not of itself, justify the operation of the facility." DOE management's statement clearly conflicts with the justifications, presented in the 1996 SSM PEIS that led to the construction of the Atlas facility.

The huge machine was built at Los Alamos National Laboratory (LANL) utilizing a large suite of existing surplus facilities. This draft EA involves a proposal to move the machine to the Nevada Test Site (NTS). It provides few details concerning the disassembly processes, the transport processes or the reassembly processes. It appears that the relocation also involves major modifications to the existing design such as the replacement of the capacitor banks. The proposal also involves building new dedicated buildings to house the machine and for support facilities. After reassembly, the machine will need to readjusted, tested and then recertified, before dipping into the operational funding that the move proponents assume will be forthcoming.

The final EA should provide candid details as what advantages are expected to be gained through the operation of this machine at this remote site, initially chosen for the conduction of atmospheric nuclear explosion tests. At LANL the facility personnel need commute only several miles to Los Alamos Townsite. At the NTS the commute would typically be about 160 miles each day. That makes little sense for a federal agency that preaches energy efficiency to the general public.

3-27 "In order to maintain the historical core competencies and capabilities of the NTS, NNSA needs to focus on issues associated with strong and efficient implementation of the Stockpile Stewardship Program, engage the technical involvement of Nevada Operations Office (NV) personnel and contractors with the technical expertise held by the national laboratories and enhance the scientific and engineering competencies and capabilities at the NTS."

The conclusions in the DOE's IG report, dealing with the Atlas facility management, indicates that that focus and efficient implementation has failed in this instance. If the Atlas facility is to be replanted in this desolate Nevada location to serve as a training tool, then the EA should make that crystal clear. If that is the primary purpose of the proposed move, then perhaps more consideration should be given to the cost effectiveness of leaving the Atlas facility at LANL and transporting, or relocating, those who need to learn from such a large and complex facility.

The DOE IG report on the BEEF indicated that the DOE nuclear weapons complex contains 41 pulsed power facilities where various hydrodynamic test can be performed. Their investigation indicated that the BEEF facility, at the NTS, was not used much and that the vast majority of the explosive shots could have been performed at more suitable sites, with significant cost reductions. BEEF was not being used by researchers from throughout the DOE complex as the operator, LLNL, originally suggested. In fact, LLNL was the only user during the IG investigation. The IG found that BEEF had been operated on a full-time basis since its opening in February of 1997 yet there were lengthy periods of time when no shots had been conducted, such as a seven month period in 1999. The IG asked LLNL why they were conducting many shots at BEEF that could be conducted at more suitable locations. The answer, in the IG report, was "[L]ivermore officials stated that they were sending shots to the BEEF because they wanted to give the facility personnel practice and to keep equipment calibrated." Perhaps similar justification are behind the plan to move the Atlas facility to the NTS. Those justifications may have more to do with keeping the NTS ready for future uses than with actual on-going nuclear weapons safety and reliability issues.

The final EA should clarify the material contained at 2-43 and 3-5. The use of the term "load leveling" should be explained in more depth and it should appear in the Glossary.

The final EA should describe alternative machines and facilities such as Pegasus II, Jupiter and the highly successful Saturn facility at Sandia National Laboratory (SNL). Other facilities should also be mentioned such as Procyon, the Advanced Hydrotect Facility (AHF), the Advanced Radiation Source (ARS) (X-1)), and the High Explosive Pulsed Power Facility (HEPPF). Perhaps some of these, as described in the 1996 SSM PEIS, were part of DOE's wish-list. Pulsed-power experimental facilities also exist at institution such as universities. Through the funding of the DOE's nuclear weapons

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division the University of Nevada at Reno has gotten into the act through its use of the former LANL ZEBRA Z-pinch machine at the Nevada Terawatt Facility. Soon the UNLV campus will have its own pulsed-power facility. The final Environmental Assessment (EA) should provide a greater depth of coverage concerning the suggested collaboration between DOE's nuclear weapons research scientist and students and faculty at regional universities.

4-6 Remove the word "continue" since according the IG Report No.: DOE/IG-0495, the Atlas facility has not yet received operational funding. Adding an additional alternative of moving Atlas to a cold standby status at LANL would be appropriate since the IG's findings indicated that machine operation had become a low priority issue.

4-20 The majority would be unlikely to be engineers and scientist if one considers all the tech, security and custodial support staff that would serve this and other facilities at the NTS.

4-40 The fabric structure suggestion indicates that the new facility planning remains tenuous. Such structures are not known for their heating and cooling energy efficiency. Such efficiency should be a major factor in DOE's planning since it is supposed to serve as an example for the rest of the nation.

The Bechtel Nevada drawing on page 6 should provide further detail that shows how the rectangular drawing on page 7 fits into the shaded circular area.

8-7 The final EA should explain the term "uncolored" and this term should also appear in the Glossary.

8-33 The expected lifetime, provided in the 1996 SSM PEIS which justified the construction, was 20 years. The final EA should explain the justifications behind reducing the expected lifetime by half. Were the appropriate congressional appropriation subcommittees made aware of this change?

8-36 The final EA should explain the word "excessed" and this word should appear in the Glossary. If it serves as a substitute for the word "scraped" then say so.

9-19 After the word converter add "(DC power supply)".

9-21 A 24 MJ charge means that 80%-90% of the stored energy is lost before the imploding liner strikes the target.

9-23 In the 1996 SSM PEIS the discharge voltage was given as less than one million volts.

10-1 In the final EA, explain why the term "characteristic" is used. Is the proposed move to the NTS a way of leaving the door open for the future use of a plutonium isotopes in the machine?

10-24 The final EA should provide more detail concerning the waste quantities expected in terms of mass and volume that will need to be disposed. Would depleted uranium debris be treated as mixed waste due to its toxic and radioactive hazard? If not, describe why it should not be treated as such.

The term "routine maintenance" should be further described. Explain the disassembly and replacement procedures that need to be followed after each shot.

10-43 "The purpose and need of the NNSA in this instance is, as stated in section 1.2, to enhance the NTS scientific and engineering capabilities and establish a capability for large-volume hydrodynamic experiments at the NTS."

This statement again indicates that the nuke safety and reliability justifications, contained in the 1996 SSM PEIS, are only secondary to management's present desire to maintain the infrastructure of the remote Nevada Test Site. This EA involves the geographic relocation of an existing facility, who's need is now in doubt at its place of construction. This proposed facility relocation was not addressed in the 1996 SSM PEIS and as a result this study should be upgraded to a NEPA EIS level.

11-4 The final EA should mention that DOE has dispersed Stockpile Stewardship activities to many additional places including to universities throughout our country. The University of Rochester's Omega laser operates on funding associated with LLNL's National Ignition Facility (NIF) project. Stanford, and many other universities, have computer development programs that are funded via DOE's Stockpile Stewardship program.

Page 11, Table 1.

The NTS acreage shown is not consistent with the old map shown on page 5. The note associated with SNL should indicate if this includes the Livermore, California site. Was consideration given to siting the Atlas Facility at places such as the LLNL Main Site or at the spacious SNL site in Livermore?

12-16 The final EA should provide more details as to why consideration of these other alternative sites was dropped. This paragraph also suggest that site infrastructure maintenance needs was the primary factor used in justifying the proposed Atlas Facility move.

12-31 Remove the word "continue" in the final EA since, according to the DOE IG report, it never had operating funds. An additional alternative is in order that involves putting the facility into a cold stand-by status, as suggested in the IG report.

Page 14, Figure 5 Map of LANL

An additional map would be useful that shows the placement of the existing Atlas Facility within TA-35.

15-16 The final EA should mention that this is public land that is temporarily withdrawn, under Public Land Order 805 (12 Feb. 1952) for the purpose of conducting atmospheric nuclear detonations.

15-20 The proposed move of the Atlas facility to the NTS is intended to help keep the site ready for the potential resumption of full-scale underground nuclear detonations there. The draft EA failed to mention that connection or to, in anyway, analyze the environmental effects that a resumed nuclear test program might have on the facility structure or on its operational purpose. The final EA should address these issues.

Section 3.0 Affected Environment section of the draft EA failed to mention, or otherwise address, the highly significant issue of environmental damage already rendered to the loaned public lands that now make up the NTS. A measure of this can be found in the DOE/NV report titled "Focused Evaluation of Selected Remedial Alternatives for the Underground Test Area" (DOE/NV-465), April 1997. Here, DOE/NV contractors estimated that a partial remediation of the underground test areas could cost as much as \$7.3 trillion dollars. Such an analysis deserves a place in the reference section of all DOE/NV NEPA reports. Interestingly, DOE/NV rarely cites this report. The final EA for the Atlas Facility should at least cite this in the reference section.

15-34 According to the 1996 NTS EIS, this airstrip is not used so mention of it should be removed in the Atlas final EA.

17-10 The final EA should mention that potential nuclear blast seismic effects were not analyzed. That EA should include such a potential effect analysis.

17-15 Over 1,030 nuclear detonations have been conducted at the NTS. The proposed Atlas site lies next to the northern edge Area 6. North of that edge lies a major NTS nuclear blast testing area. The fallout was not blocked by artificial political boundary lines such as the ones that define Area 6. Areas that contain less than 10pCi/g of plutonium-239 in the soil are wide-spread at the NTS. When Pu-239 is present there is a good chance that fission products are also present. The final EA should provide a quantitative value for what the draft EA states is a small area. Could that be a blast circle, a mile in diameter? The term "residual" is deceptive and should be removed in the final EA. Virtually, none of the initial fallout plutonium-239 has been removed from the vast majority of the land surface. Since Pu-239 has a half-life of ~24,000 years, virtually all that material that fell to the NTS surface,

remains there and will continue to remain radioactive for tens of thousands of years. The traditional practice of NTS environmental managers, selectively withholding information, needs to end. This practice is not protective of the public, the environment or of a free and open democracy which depends upon the trust of its people.

20-34 The External gamma radiation exposure data produced by the on-site thermoluminescent dosimeter network fails to provide comprehensive radiation exposure detection. That network fails to detect many beta and alpha particle emitters including those that may have entered into the body of human and non-human organisms. The draft EA readers should notice that the most recent data in this paragraph was based on 1994 data. That should provide an indication of much has been learned from past practices of providing the public with timely results. Let's see if the final EA can do better.

27-29 "At the NTS, it is anticipated that the Atlas facility, including the machine and the buildings, would consume approximately 500,000 kilowatt hours/year."

If 40 shots are performed each year that deliver 5 MJ of energy to the target region, then that amounts to approximately 0.01% of the total operating energy for the facility. Again, some people may wonder about the sincerity of this agency that preaches energy efficiency to the public.

30-5 If lead is is classified as a HAP then an explanation is in order concerning why depleted uranium (DU) is not classified as a HAP.

30-14 The final EA should describe the engineering considerations for Atlas that limit it to 100 experiments per year.

31-3 Before the word "public" insert the word "accessible."
The NTS remains public land but is restricted from public access.

43-26 In the 1996 SSM PEIS, mention is made of a capacitor explosion that results in shrapnel being shot into the hi-bay. Interestingly, the Atlas draft EA fails to mention or analyze such a situation. Instead it mentions a capacitor bank fire which may be a "politically correct" reference to what may have started with an explosion. The draft EA indicates the risk as less than once in 10,000 years of operation.

Before the final EA is issued, a thorough analysis should be performed as to how this "once in 10,000 year" figure was derived. This analysis should be totally independent, using academics who have no recent past, or present, connections with the DOE or its SSM program. If the original analysis is found to be way off-base then the consequence should be the termination of the Atlas program, along with the individuals responsible for the faulty analysis and its management review.

44-14 If the phrase "accidental release" includes the possibility of an explosive release, then state that openly. The same goes for the phrase "operational fault (breakdown)".

46-32 Add to the definition a conversion factor to Teslas.

All public comments on this EA should be published verbatim, rather than just summarized by the DOE/NV. A reference to the exact location of the public's original comments should appear on the web page associated with the final EA.

The final EA should contain a list of preparers which includes the persons name, their project position, their work division and in the case of contractors, the contracting company name.

In addition, a project work flow chart would prove useful which shows the relationship of the primary EA prep. contractor to the DOE/NV office.

An initial EA distribution list would be a useful addition to the final Atlas EA.

Conclusion

According to the DOE's own Inspector General Audit Report No.: DOE/IG-0495, there were serious management flaws concerning the decision to complete the construction of the Atlas Facility before operation funding was assured. Then other management decisions were made to relocate the new machine before operating funds could be procured. The justifications for that move appear to be tied to preserving the NTS infrastructure more than to the increasingly questionable use of the Atlas Facility for maintaining the safety and reliability of the U.S. nuclear weapon arsenal. The IG suggested that the Atlas Facility not be moved from LANL. This is the same as the draft EA's No Action Alternative. For a rare change, its time DOE management bit the bullet and select the No Action Alternative. After that, serious consideration should be given to placing this embarrassing machine into a cold stand-by status.

Web References

"The Need for the Atlas Pulsed Power Experimental Facility"
DOE/IG/Audit Report No.: DOE/IG-0495, February 2001
<http://www.ig.doe.gov/pdf/ig-04595.pdf>

"Utilization of the Big Explosives Experimental Facility"
DOE/IG/Audit Report No.: WR-B-01-03, March 2001
<http://www.ig.doe.gov/pdf/wrb0103.pdf>

Sincerely,

Vernon Brechin

Vernon Brechin

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650/961-5123

E-mail CC:

Keith Rogers - Journalist, Las Vegas Review-Journal
Mary Manning - Journalist, Las Vegas Sun
Glenn Roberts - Journalist, ANG Newspapers, Pleasanton, CA
Kalynda Tilges - Citizen Alert, Las Vegas
Katlin Backlund - Citizen Alert, Reno
Greg Mello - Los Alamos Study Group, Santa Fe, NM
Andrew Lichterman - Western States Legal Foundation, Oakland, CA
Marylia Kelley - Tri-Valley CAREs, Livermore, CA



MESCALERO *Apache* TRIBE

Sara Misquez, President Mescalero, New Mexico 88340

Tribal Historic Preservation Office

P.O. Box 227

Mescalero, NM 88340

Phone: 505/671-4494 ext. 279

Fax: 505/671-9191

Mr. Kenneth A. Hoar, Director
Environment, Safety & Health Division
Nevada Operations Office
U.S. Department of Energy
P.O. Box 98518
Las Vegas, NV 89193-8518

(X) The *Mescalero Apache Tribe* has determined that the proposed project Atlas Relocation and Operation at the Nevada Test Site **WILL NOT AFFECT** any objects, sites, or locations important to our traditional culture or religion.

() The *Mescalero Apache Tribe* has determined that the proposed _____ project by _____ **WILL AFFECT** objects, sites, or locations important to our traditional culture or religion. We request that the _____ undertake further consultations to evaluate the effects of the project on these sites.

Thank you for providing the Mescalero Apache Tribe the opportunity to comment on this project. We look forward to reviewing and commenting on future DOE projects.

CONCUR:

Donna Stern-McFadden

Name

Donna Stern-McFadden

Signature

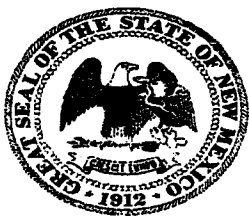
3-26-01

Date

Tribal Historic Preservation Officer

Title

COMMENTS:



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

Office of the Secretary
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Santa Fe, New Mexico 87502-6110
Telephone (505) 827-2855
Fax (505) 827-2836



PETER MAGGIORE
SECRETARY

PAUL R. RITZMA
DEPUTY SECRETARY

March 22, 2001

Kenneth A. Hoar, Director
Environment, Safety & Health Division
Nevada Operations Office
U.S. Department of Energy
P.O. Box 98518
Las Vegas, NV 89193-8518

Dear Mr. Hoar:

**RE: PREAPPROVAL DRAFT ENVIRONMENTAL ASSESSMENT (EA) ON THE ATLAS
RELOCATION AND OPERATION AT THE NEVADA TEST SITE (NTS)**

New Mexico Environment Department (NMED) staff reviewed the information on the above-referenced Draft Environmental Assessment (DEA). Based on that information the review indicates that the proposed project does not appear to conflict with New Mexico's environmental statutes or regulations at this time. There was nothing in the document that indicated increased hazardous waste generation, storage, treatment or disposal. Should unforeseen events cause the generation of such waste then the management of such waste would be covered by the Los Alamos Hazardous Waste Permit and possibly the Federal Facility Compliance Order should the waste be mixed waste.

We have two minor comments concerning this document:

- (1) Page 8, Line 7: The use of the word "uncolored" for university and foreign visiting scientists apparently refers to a security classification; however, this may not be obvious to those unfamiliar with security operations at the facility. We recommend changing this sentence to reflect the usage of the word "uncolored".
- (2) Page 35, Lines 24 and 25: You should change the referenced New Mexico Air Quality Control Regulation (AQCR) 702 to the current New Mexico Administrative Code (NMAC) designation: 20.2.72 NMAC.

We appreciate the opportunity to comment on this project.

Sincerely,

Gedi Cibas, Ph.D.
Environmental Impact Review Coordinator

NMED File No. 1433ER

ACTION	_____
INFO	_____ <i>ESHD</i>
MGR	_____ <input checked="" type="checkbox"/>
AMBFS	_____
AMTS	_____ <input checked="" type="checkbox"/>
AMNS	_____
AMEM	_____
AMPIA	_____

LC *WJ*



DEPARTMENT OF ADMINISTRATION

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Carson City, Nevada 89701-4298

Fax (775) 684-0260

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March 26, 2001

Kenneth A. Hoar, Director
Environment, Safety & Health Division
Nevada Operations Office
U.S. Department of Energy
P.O. Box 98518
Las Vegas NV 89193-5818

Re: SAI NV # E2001-111

Project: Atlas Relocation and Operation at the Nevada Test Site

Dear Mr. Hoar:

Enclosed are the comments from the Nevada Division of Water Resources concerning the above referenced report. Other agencies, with the authority to represent the state's position may have commented under separate cover for your consideration. These comments constitute the State Clearinghouse review of this proposal as per Executive Order 12372. Please address these comments or concerns in your final decision. If you have questions, please contact me at 684-0209.

Sincerely,

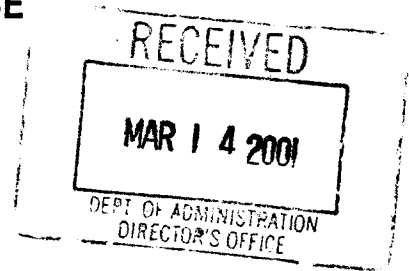
A handwritten signature in cursive script, reading "Heather K. Elliott".

Heather K. Elliott
Nevada State Clearinghouse/SPOC

ACTION	ESH
INFO	
MGR	✓
AMBFS	
AMTS	✓
AMNS	
AMEM	
AMPIA	

NEVADA STATE CLEARINGHOUSE

Department of Administration
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Fax (775) 684-0260



DATE: March 2, 2001

Governor's Office

Agency for Nuclear Projects

Agriculture

Business & Industry

Energy

Minerals

Economic Development

Tourism

Fire Marshal

Human Resources

Aging Services

Health Division

Indian Commission

Colorado River Commission

Legislative Counsel Bureau

Information Technology

Emp. Training & Rehab Research Div.

PUC

Transportation (air)

UNR Bureau of Mines

UNR Library

UNLV Library

Historic Preservation

Emergency Management

Office of the Attorney General

Washington Office

Nevada Assoc. of Counties

Nevada League of Cities

Conservation-Natural Resources

Director's Office

State Lands

Environmental Protection

Forestry

Wildlife

Region 1

Region 2

Region 3

Conservation Districts

State Parks

Water Resources

Natural Heritage

Wild Horse Commission

Nevada SAI # E2001-111

Project: Atlas Relocation and Operation at the Nevada Test Site

Yes ☒ No ☐ Send more information on this project if becomes available

CLEARINGHOUSE NOTES:

Enclosed, for your review and comment, is a copy of the above mentioned project. Please evaluate it with respect to its effect on your plans and programs; the importance of its contribution to state and/or local areawide goals and objectives; and its accord with any applicable laws, orders or regulations with which you are familiar.

Please submit your comments no later than **March 26, 2001**. Use the space below for short comments. If significant comments are provided, please use agency letterhead and include the Nevada SAI number and comment due date for our reference. Questions? Heather Elliott, 684-0209.

THIS SECTION TO BE COMPLETED BY REVIEW AGENCY:

___ No comment on this project

___ Proposal supported as written

___ Additional information below

___ Conference desired (See below)

___ Conditional support (See below)

___ Disapproval (Explain below)

AGENCY COMMENTS:

Any new water rights appropriations within the State of Nevada must be done pursuant to Nevada Revised Statutes chapters 533 and 534. Any claims of reserved water rights within the State of Nevada are determined under Nevada water law – Nevada Revised Statutes chapter 533.

Karl Eitenmiller
Signature
KARL EITENMILLER

WATER RESOURCES

Agency

03-12-01

Date

KENNY C. GUINN
Governor

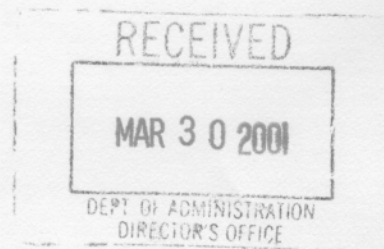
CHARLOTTE CRAWFORD
Director



YVONNE SYLVA
Administrator

MARY E. GUINAN, M.D., Ph.D.
State Health Officer

STATE OF NEVADA
DEPARTMENT OF HUMAN RESOURCES
HEALTH DIVISION
BUREAU OF HEALTH PROTECTION SERVICES



March 29, 2001

Heather Elliot
Nevada State Clearinghouse
Department of Administration
Budget and Planning Division
209 East Musser Street, Room 200
Carson City, NV 89701-4298

NEVADA SAI # E2001-111

SUBJECT: "ATLAS RELOCATION AND OPERATION AT THE NEVADA TEST SITE" dated February 27, 2001.

Dear Ms. Elliot:


The Nevada State Health Division is responsible under NRS 459 for protection of the public and property in the State of Nevada from sources of ionizing radiation.

Although the use of radioactive materials and associated activities on the NTS is exempt from certain state radiation control requirements, any release of radioactive materials to public areas off the NTS is subject to radiation control requirements and public health protection laws.

As a result, staff review of the subject document is with respect to potential release of radioactive materials to areas outside of the Nevada Test Site (NTS). Review indicates that the proposed Atlas Facility is in a remote portion of the NTS and the relatively low possibility of producing ionizing radiation outside of the facility appears to pose no discernable risks to public health and safety. Consequently, we have no further concern regarding this proposal.

- ☐ Bureau Administration
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State Revolving Fund
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- ☐ Health Protection Services
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Radiological Health
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Fax (702) 486-5024
- ☐ Health Protection Services
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- ☐ Health Protection Services
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Fallon, NV 89406-3324
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- ☐ Health Protection Services
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Ely, NV 89301-0939
(775) 289-3325
- ☐ Health Protection Services
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250 N. Highway 160, Ste. 5
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(775) 751-7415

Sincerely,

A handwritten signature in black ink, appearing to read "Stanley R. Marshall". The signature is fluid and cursive, with the first name "Stanley" being more prominent.

Stanley R. Marshall, Supervisor
Radiological Health Section
Bureau of Health Protection Services

cc: Alan Tinney, Chief, Bureau of Health Protection Services
Larry Franks, Radiation Physicist, Radiological Health Section

rh\doe\AtlasFacilityreview032301



KENNY C. GUINN
Governor

MICHAEL D. MILLERBY
Department Director

STATE OF NEVADA
DEPARTMENT OF MUSEUMS, LIBRARY AND ARTS
STATE HISTORIC PRESERVATION OFFICE
100 N. Stewart Street
Carson City, Nevada 89701-4285

RONALD M. JAMES
State Historic Preservation Officer

March 23, 2001

MEMORANDUM

TO: Nevada State Clearinghouse

FROM: Alice M. Baldrica, Deputy SHPO *Alice M Baldrica*

SUBJECT: Atlas Relocation and Operation at the Nevada Test Site NV
SAI# E2001-111

The environmental assessment does not adequately address potential effects to historic properties that may exist in Area 6. Although the Department of Energy proposes to avoid impacts to archaeological resources and construct the building on a previously disturbed area, we request the agency provide us with additional information such as a map indicating the location of the new facility within Area 6 and its relationship to other structures. Also, will access roads and utilities transmission lines be constructed as part of this project? What effects might they have on historic properties?

Until we receive the requested information about the project, we cannot comment on its effect to historic properties. If the agency has questions about what is needed, please call me at 775-684-3444.

Linda Lohm ^{DOE} NV
702-295-2261
from Mand
@NV Budget
3/30/01



DEPARTMENT OF ADMINISTRATION

209 E. Musser Street, Room 200

Carson City, Nevada 89701-4298

Fax (775) 684-0260

(775) 684-0209

April 10, 2001

Mr. Kenneth A. Hoar, Director
Environment, Safety and Health Division
Nevada Operations Office
Department of Energy
PO Box 98518
Las Vegas NV 89193-5818

Re: SAI NV #E2001-111

Project: Atlas Relocation and Operation at the Nevada Test Site

Dear Mr. Hoar:

Enclosed is an amended comment from the Nevada State Historic Preservation Office that was received after our previous letter to you. Please incorporate this comment into your decision making process. If you have any questions, please contact me at (775) 684-0209.

Sincerely,

A handwritten signature in cursive script that reads "Heather K. Elliott".

Heather K. Elliott
Nevada State Clearinghouse/SPOC

Enclosure

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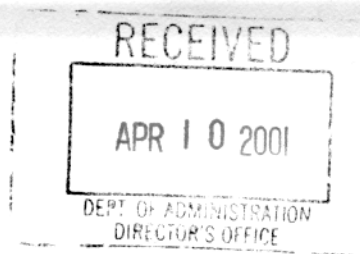
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KENNY C. GUINN
Governor

MICHAEL D. HILLERBY
Department Director

STATE OF NEVADA
DEPARTMENT OF MUSEUMS, LIBRARY AND ARTS
STATE HISTORIC PRESERVATION OFFICE
100 N. Stewart Street
Carson City, Nevada 89701-4285



RONALD M. JAMES
State Historic Preservation Officer

April 6, 2001

MEMORANDUM

TO: Heather Elliott, Nevada State Clearinghouse

FROM: Alice M. Baldrice, Deputy SHPO *Alice M Baldrice*

SUBJECT: Atlas Relocation and Operation at the Nevada Test Site, NV SAI#2001-111

The Department of Energy submitted additional information (see attached) indicating that the neighboring structures are all modern (15 years in age) metal butler buildings. No historic properties exist within the area of potential effect and the proposed Atlas Relocation will not affect historic properties.

Please amend our previous memorandum. We have no further comments on the proposed action.



United States Department of the Interior

FISH AND WILDLIFE SERVICE

New Mexico Ecological Services Field Office
2105 Osuna NE
Albuquerque, New Mexico 87113
Phone: (505) 346-2525 Fax: (505) 346-2542

April 3, 2001

Cons. # 2-22-01-I-257

Mr. Kenneth A. Hoar, Director
Environment, Safety & Health Division
Nevada Operations Office
U.S. Department of Energy
P.O. Box 98518
Las Vegas, NV 89193-8518

Dear Mr. Hoar:

This letter responds to your February 26, 2001, letter requesting review and comment on a draft Environmental Assessment on the proposed relocation and operation of the Atlas pulsed-power machine from its current location at Los Alamos Laboratory in New Mexico to the Nevada Test Site in southern Nevada. We have reviewed the document for impacts to federally listed endangered, threatened and candidate species and associated habitat in New Mexico and anticipate no impacts within this state. As our office only covers New Mexico, you should also request review from our Nevada office at:

U. S. Fish and Wildlife Service
Nevada Fish and Wildlife Service
1340 Financial Boulevard, Suite 234
Reno, Nevada 89502-7147
(775) 861-6300

If you have any questions regarding this information, please contact Maureen Murphy at the letterhead address or at (505) 346-2525, ext. 115.

Sincerely,

Joy E. Nicholopoulos
Field Supervisor

ACTION
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